



THE CITY OF NEW YORK
LAW DEPARTMENT

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February 15, 2023

Via ECF

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application GRANTED. The deadline for all Defendants to respond to the Complaint is extended until April 21, 2023.
SO ORDERED.

Dated: February 16, 2023

Re: Vora v. New York City Department of Education, et al.
Civil Action No.: No. 22-cv-10891 (PGG) (SDA)
Law Dept. No.: 2023-008432

Dear Judge Gardephe:

I am an Assistant Corporation Counsel in the office of Hon. Sylvia O Hinds-Radix, Corporation Counsel of the City of New York, assigned to represent Defendant New York City Department of Education ("DOE") in the above-referenced action. In accordance with Your Honor's Individual Rules of Practice, I write to respectfully request an extension of time from February 23, 2023 until April 21, 2023 for Defendant DOE to respond to the Complaint. This is Defendant's first request for an extension of time and it is being made with the consent of pro se Plaintiff. This extension is requested so this Office may adequately investigate the allegations made in the Complaint and prepare a proper response.

In addition, this Office is in the process of confirming whether the individual defendants, Kristin Erickson and Paul Rotondo, were served. The additional time will also allow this Office to determine whether service has been effectuated and determine representation pursuant to General Municipal Law Section 50-k. Without appearing on behalf of the individual defendants, I ask that their time to respond be extended until April 21, 2023 as well.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ _____
René L. Macioce
Assistant Corporation Counsel

cc: Shreedevi Vora (via UPS NEXT DAY)
Pro Se Plaintiff
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